

EXHIBIT B

Assertions related to Laurie Cooper in Plaintiffs Original Petition “C” indicates a characterization.

“AF” indicates and alleged fact.

[CHART BEGINS ON NEXT PAGE]

¶ No.	TEXT	“C” or “AF”	Location where alleged events occurred
18	Cooper is Registered Agent for Starrex Title Florida, LLC	AF	Florida
19	Cooper is the former President of Mag Title FL and Mag Title AR	AF	Florida/Arkansas
19	Cooper is a resident of Florida	AF	Florida
31	“This Court has personal jurisdiction over Laurie Cooper... because she purposefully availed herself of the privileges and benefits of conducting business in Texas.”	C	Conclusory reference to Texas
32	“Cooper, while still employed by and owing fiduciary duties to plaintiffs Magnolia Title Arkansas, Ltd. and Magnolia Title Florida, LLC, misappropriated their trade secrets, intellectual property, customer data, and other proprietary information that was hosted on computer systems in Texas and belonged to Texas entities.	AF	Florida/Arkansas; conclusory reference to Texas
33	MarketStreet Capital Partners AR, LLC conspired with and aided and abetted Cooper in misappropriating and misusing misappropriated Texas trade secrets, customer data and other proprietary information to facilitate its competing title business operations improperly usurped from the Magnolia entities. It knew or should have known that its conduct would have effects in the forum state of Texas.	AF	Florida/Arkansas; conclusory reference to Texas
34	Starrex Title Florida, LLC, through Cooper, misappropriated Magnolia entities’ Texas trade secrets and business assets thus Starrex purposefully availed itself of jurisdictional contacts in Texas.	AF	Florida/Arkansas; conclusory reference to Texas
35	All defendants’ contacts with Texas arise from the same operative facts giving rise to this litigation regarding misappropriation of trade secrets and corporate opportunities belonging to Texas entities. Thus, specific personal jurisdiction exists that comports with due process.	C	Conclusory reference to Texas
36	“Personal jurisdiction over these defendants is proper... because the recruited Texas residents like Cooper for employment....”	C	Cooper is not now and never has been a Texas resident.
37	Even if all of a corporate representative’s actions are performed in his corporate capacity, the officer or member may also be subjected to personal jurisdiction and held liable in his individual capacity for those actions if they were tortious.”	C	

39	Defendants conspired, “...with Texas residents like Cooper....”	C	Cooper is not now and never has been a Texas resident.
206	Cooper lead the magnolia employees in Starrex’s takeover of Mag Title FL and Mag Title AR,	AF	Florida/Arkansas
211	Starrex, Merritt, Brewer, MarketStreet, Cooper, and Starrex Title Florida then proceeded to use the platform to seed the Magnolia Florida and Magnolia Arkansas locations it completely took over with the participation of MarketStreet, Brian Brewer, Laurie Cooper, Debbie Merritt, Starrex Insurance Holdings, Inc., and Starrex Title Florida, LLC (managed by Starrex Insurance Holdings, Inc).	AF	Florida/Arkansas
215	“MarketStreet Capital Partners and MarketStreet AR, in collaboration with Starrex Title Florida, LLC (for Florida), Cooper (for both Florida and Arkansas), Merritt (same), and Brewer (same), simply claim these addresses, names and phone numbers as their own.”	AF	Florida/Arkansas
215	Cooper and Starrex provided and delivered the proprietary and trade secret data that seeded the businesses of MarketStreet and Starrex Title Florida.	AF	Florida/Arkansas
215	Cooper works for Brewer’s MarketStreet companies, Mag Title FL and Mag Title AR	AF	Florida/Arkansas
219	Cooper wrote to Magness by text on January 17, 2024.	AF	Florida
219	Merritt, Hill, Cooper, Brewer, MarketStreet, and other co-conspirators, potentially including other professionals and advisors, agreed to proceed with the theft and conversion of Magnolia Title Florida and Magnolia Title Arkansas.	AF	Florida/Arkansas
219	<i>They</i> solicit Cooper in breach of the non-solicitation provision of the Letter Agreement between Starrex and the Magnolias and partner with her.	AF	Florida/Arkansas
221	Starrex registered Starrex Title Florida, LLC on January 5, 2024, with the help of Laurie Cooper. Thus, it seems that Cooper had begun actively participating in the conspiracy at least as early as January 5, 2024, while still employed as the President of Magnolia Florida and Magnolia Arkansas.. She would not formally resign as President until about a month later February 2, 2024.	AF	Florida/Arkansas
222	“...on information and belief....” a “collection of third parties” appear to be using Magnolia assets “with the help of Hill, Cooper, Brewer, MarketStreet and other coconspirators, with apparently some participation in Florida by Starrex Title Florida	AF	Florida/Arkansas

223	Laurie Cooper is the registered agent for Starrex Title Florida, LLC	AF	Florida
224	Cooper was still president of Mag Title FL and Mag Title AR on 01/05/2024, but was the “designated agent in charge of Starrex Title Florida LLC	AF	Florida
226	Cooper sends a text to Magness	AF	Florida
228	Cooper is listed as the agent in charge of Starrex Title Florida LLC, On January 18, 2024,	AF	Florida
230	Cooper is designated as the Florida registered agent for MarketStreet’s “Magnolia Title Florida” and “Magnolia Title Company” in Arkansas on 01/30/2024.	AF	Florida/Arkansas
234	Cooper files application for registration of Fictitious Name “Magnolia Title Company” in Florida on 02/09/2024.	AF	Florida
236	Cooper files application for registration as title agents in Arkansas with name “Magnolia Title Company” on 02/09/2024.	AF	Arkansas
237	“Starrex Insurance Holdings, MarketStreet, MarketStreet AR, Cooper, and Merritt, completely took over, stole and tortiously interfered with, Magnolia Florida and Magnolia Arkansas and numerous contracts, including earnest money contracts in progress. Customers were obtained by using Mag Title FL’s proprietary customer data, some of which was procured by Laurie Cooper.	AF	Florida/Arkansas
239	“Cooper formally resigned by email sent on February 2, 2024 at 3:10:06 PM CST, stating that she was resigning from her position as Division President of Magnolia Title Arkansas and Magnolia Title Florida, effective immediately. Cooper also indicated in her email that all Florida employees had resigned effective immediately. Thus, Cooper would now only act for herself individually and apparently, at times, on behalf of Starrex Title Florida, LLC and Marketstreet.	AF	Florida/Arkansas
240	“Cooper also took various proprietary information, customer lists, customer transactions in progress and other valuable intellectual property belonging to Magnolia Title Arkansas and Magnolia Title Florida over to her new employers, MarketStreet and Starrex, in order to seed the business and continue work on all the transactions in progress. Cooper admitted that she was “wrong” for downloading a customer list”	AF	Florida/Arkansas
241	But despite her resignation, she [Cooper] would continue to represent herself as the President of Magnolia Title Florida and Arkansas and run the takeovers of the Magnolias, to this very day.	AF	Florida/Arkansas

242	Despite her formal resignation, Cooper acted as though she still worked for Magnolia	C	
242-266	Allege facts related to purported actions of Cooper and other defendants related to the operations of Magnolia Title Florida and MarketStreet Capital Partners AR, LLC/Starrex d/b/a Magnolia Title Company (AR)	AF	Florida/Arkansas
391-395	Bare allegation or claim against STARREX TITLE FLORIDA. LLC. MERRITT AND COOPER for Conversion of Magnolia Companies valuable intellectual property and other assets.	C	